



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

MEMORANDUM

Date: September 7, 2011

Re: EPA Comments on Draft Smurfit-Stone Mill Preliminary Assessment Report

To: Jeff Miller
UOS

From: Rob Parker
EPA

Overall, I thought the report was well organized and provides a lot of information. After incorporating MDEQ's comments, I have a few comments, which can be seen below.

1. In section 3.1, Site Description, the third paragraph begins "The area of influence of the site is defined as a 4-mile radius surrounding the outside perimeter of the mill and the Clark Fork River to a distance 15 miles downstream of the mill site". This could be misinterpreted to those unfamiliar with the HRS target distance limits. I would change to "target distance limit is defined as..."
2. In Table 1, you reference Dioxins, furans, PAHs, and metals that were not discussed in Section 3.3. Where were those compounds produced/used in the process? Could you expand on Section 3.3?
3. In Table 1, Liquids, could you add dates to the wastewater disposal locations (i.e. direct discharge from 19XX - 1969)
4. In general for Table 1, I would try to remove as many "unknowns" as possible.
5. For Table 3, could we estimate the population by multiplying the average number of people in each household by the number of wells in each radius?
6. In the summary, there is a paragraph that discusses municipal water supply using groundwater. We should be clear (if this is the case) that none of these wells have detected compounds associated with this site (or above health based standards, etc).
7. The Preliminary Assessment Report Form 2050-0095 should be looked at. It appears multiple boxes are selected (at least on the electronic version I have) for multiple sections.
8. Section 7 of the PA Form should have estimated populations similar to comment 5.

9. Section 8 of the PA form (which could be read incorrectly based on comment 7 above) appears to have no identified sensitive environments. There are wetlands within the TDL, though, which should be included.

Comments on Draft PA for Smurfit Stone Mill

Robert Parker

to:

Jeff_Miller

09/07/2011 12:50 PM

Hide Details

From: Robert Parker/R8/USEPA/US

To: Jeff_Miller@urscorp.com

1 Attachment



2011 09 07 EPA comments to START.pdf

Jeff,

Thanks for putting together this good report. I do have a few comments to add to those submitted by DEQ. You can see those comments in the attachment. Please don't hesitate to contact me if you have any questions regarding these comments.

I hope that we are still on pace to have a completed PA ready for review and a FSP for SI/RA sampling ready for review by the time you leave next week. Let me know if that changes.

Thanks,

Rob

Rob Parker

Site Assessment Manager, Environmental Engineer

U.S. Environmental Protection Agency, Region 8

Address: 1595 Wynkoop St, 8EPR-SA, Denver, Colorado 80202-1129

Email: parker.robert@epa.gov | Direct Phone: (303) 312-6664



Re: Comments on Draft PA for Smurfit Stone Mill

Jeff_Miller

to:

Robert Parker

09/07/2011 04:06 PM

Hide Details

From: Jeff_Miller@URSCorp.com

To: Robert Parker/R8/USEPA/US@EPA

Hi Rob,

Thank you for those. I will get back to you with any questions/explanations on your comments early next week, once I've got the FSP in review and get a chance to pour through them in detail.

I think I am still on target to get both the draft FSP and the draft Final PA out to you by next Friday. I think I've successfully conveyed the importance of me being in the office until then.

For the PA, from a first read, I don't see any comments from either yourself or the DEQ that will be hard to address. Do you know if Joyce intends on providing comments? I'm guessing not to the PA.

As for the FSP, I had a little bit of difficulty combining both the RA and SI/HRS aspects into one FSP, but think I've got a sensible and readable format now. I am currently about 75% done, and am hoping to get the draft to Barry for review tomorrow by COB. I may have to find someone else to review the plan Friday instead.

All for now,
Jeff

Jeff Miller - Senior Environmental Scientist
URS Operating Services, Denver, CO
303-291-8212 office - direct
720-810-0790 - cell

-----Parker.Robert@epamail.epa.gov wrote: -----

To: Jeff_Miller@urscorp.com
From: Parker.Robert@epamail.epa.gov
Date: 09/07/2011 12:50PM

Subject: Comments on Draft PA for Smurfit Stone Mill

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Thanks,

Rob

Rob Parker—
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[attachment "2011 09 07 EPA comments to START.pdf" removed by Jeff Miller/Denver/URSCorp]

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